

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE SEIZURE OF) **FILED EX PARTE AND UNDER SEAL**
ALL FUNDS ON DEPOSIT IN SOVEREIGN)
BANK ACCOUNT NUMBER 39804154654,) Criminal Case No. 11-MJ-01159-RBC
HELD IN THE NAME OF VANESAS PAPAS,)
UP TO THE AMOUNT OF \$25)
)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN SOVEREIGN)
BANK ACCOUNT NUMBER 10027369346,)
HELD IN THE NAME OF VANESAS PAPAS,)
UP TO THE AMOUNT OF \$25)
)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN SOVEREIGN)
BANK ACCOUNT NUMBER 39802503753,)
HELD IN THE NAME OF SECURE TRADING)
DEALS LLC, UP TO THE AMOUNT OF \$50)
)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN SOVEREIGN)
BANK ACCOUNT NUMBER 31104969261,)
HELD IN THE NAME OF SECURE TRADING)
DEALS LLC)
)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN SOVEREIGN)
BANK ACCOUNT NUMBER 39804195681,)
HELD IN THE NAME OF AMZ SECURE)
MARKET LLC)
)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4637468273,)
HELD IN THE NAME OF AMZ SECURE)
MARKET, LLC)
)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4638436602,)
HELD IN THE NAME OF AMAZ ONE)
COMMERCE, LLC)

FEB 21 2012 All documents to Attorney Dennis J. Attilas, Esq.

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4635076913,)
HELD IN THE NAME OF AMA ZONE)
MARKET, LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4628327666,)
HELD IN THE NAME OF SECURE TRADING)
COMMERCE, LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4628327718,)
HELD IN THE NAME OF SECURE TRADING)
COMMERCE, LLC, UP TO THE AMOUNT)
OF \$100)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4634636011,)
HELD IN THE NAME OF SECURE TRADING)
DEALS, LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN BANK OF)
AMERICA ACCOUNT NUMBER 4616915077,)
HELD IN THE NAME OF POSITIVE)
AUTOMOTIVE, LLC, UP TO THE AMOUNT)
OF \$1,000)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN CITIZENS)
BANK ACCOUNT NUMBER 1323462527,)
HELD IN THE NAME OF AMA SECURE)
MARKET LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN CITIZENS)
BANK ACCOUNT NUMBER 1322206314,)
HELD IN THE NAME OF PPL TRADING)
SERVICES LLC)

IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN CITIZENS)
BANK ACCOUNT NUMBER 1323462373,)
HELD IN THE NAME OF SECURE TRADING)
COMMERCE LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN CITIZENS)
BANK ACCOUNT NUMBER 1321960198,)
HELD IN THE NAME OF AMA ZONE)
MKT LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN CITIZENS)
BANK ACCOUNT NUMBER 1323220930,)
HELD IN THE NAME OF SECURE TRADING)
LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN CITIZENS)
BANK ACCOUNT NUMBER 1322125136,)
HELD IN THE NAME OF AMAZ ONE)
COMMERCE LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN TD BANK,)
N.A. ACCOUNT NUMBER 8248930724,)
HELD IN THE NAME OF PPL TRADING)
SERVICES LLC)
)
IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS ON DEPOSIT IN TD BANK,)
N.A. ACCOUNT NUMBER 8248675106,)
HELD IN THE NAME OF AMZ SECURE)
MARKETING LLC)

MOTION TO SEAL

The United States, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby moves to seal, pursuant to Local Rule 7.2, this Motion to Seal, the seizure warrant applications, the supporting Affidavit of United States Postal

Inspector Ryan T. Noonan, the seizure warrants, any ruling on this Motion, and all paperwork filed herewith related to the above-captioned matters, until further order of this Court, except that the United States may serve a copy of the warrants on the owners and/or custodians of the property to be seized at the time of the seizure and may later produce copies of the seizure warrants and related documents to the defense during discovery in any criminal case.

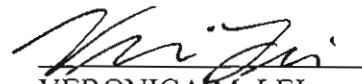
As grounds therefore, the government states that the public disclosure of the information contained in said documents could lead to efforts by the owners or possessors of the assets to transfer, place liens upon, deplete, or otherwise impair the forfeitability of the assets.

WHEREFORE, the United States respectfully requests that this Court impound this Motion, the seizure warrant applications, the supporting Affidavit, and the seizure warrants until further Order of the Court. Moreover, the United States respectfully moves, pursuant to General Order 06-05 of the United States District Court for the District of Massachusetts, that the United States, including employees, contract employees, and agents of the United States Attorney's Office for the District of Massachusetts, and any law enforcement officers involved in the investigation, be provided copies of all sealed documents that the United States Attorney has

filed in the above-styled matters.

Respectfully submitted,
CARMEN M. ORTIZ,
United States Attorney,

By:



VERONICA M. LEI
Assistant United States Attorney
U.S. Attorney's Office
One Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100

Date: February 21, 2012

So Ordered:

ROBERT B. COLLINGS
United States Magistrate Judge

Date: February 21, 2012